

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
IN CLERKS OFFICE
C.A. #04-10550-WGY
2005 JAN 31 P 1:59

JACQUELINE LASSITER

v.

KIMBER ANDERSON ET AL.

MOTION FOR ORDER THAT FLEET
NATIONAL BANK SUPPLEMENT
ANSWER TO REQUEST FOR
PRODUCTION

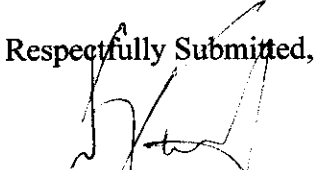
The plaintiff hereby moves that this Court issue an Order to defendant Fleet National Bank that it supplement its response to Plaintiff's Request For Production, #7.

Plaintiff states that she has made written request on the defendant that it supplement its response #7 to indicate the "unavailability" of an Affirmative Action Plan but that she has not been served with any such supplementation.

Plaintiff further states that supplementation is necessary to present an accurate record with respect to the defendant's compliance with its obligations imposed by 41 CFR S.60-1.12(a);(b);(d) and 60-1.40 et seq.; First Alabama Bank of Montgomery v. Donovan, 692 F.2d 714 (1982); and is relevant to the material issue of discriminatory intent. Morman v. John Hancock Mut.Life Ins.Co., 672 F.Supp.993 (E.D.Mich.,1987).

Plaintiff relies on Exhibit 2, which is on file in this action and on the Affidavit (of counsel) annexed and Exhibit 10.

Respectfully Submitted,


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